

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
FEB 24 2016
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL BRUCE MCDONALD,

Defendant.

No.

4:16CR00083 HEA/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C.

§ 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital,
oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§ 2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other

high speed data processing device performing logical, arithmetic or storage functions, including

any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about August 1, 2015, and on or about February 24, 2016, within the Eastern District of Missouri and elsewhere,

MICHAEL BRUCE MCDONALD,

the Defendant herein, did knowingly transport child pornography using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, to wit, defendant transported via the internet, image files that contained child pornography, including, but not limited to, the following:

A. “Gabriella03.JPG” - a graphic image file that depicts a minor female in a lascivious display of her genitals;

B. "Jan03.jpg" – a graphic image file that depicts a minor female in a lascivious display of her genitals, and a minor female engaged in sexual intercourse with a minor male;

C. "3isFun.jpg" – a graphic image file that depicts a minor male engaged in sexual intercourse with a minor female and the female performing oral sex on another minor;

D. "YNG 05.jpg" – a graphic image file of a minor female in a lascivious display of her genitals;

E. "YNG 06.jpg" – a graphic image file of a male inserting his fingers into the genitals of a minor female;

F. TSO20.jpg – a graphic image file of a minor female in a lascivious display of her genitals;

In violation of Title 18, United States Code, Sections 2252A(a)(1) and 2.

TRUE BILL.

FOR PERSON

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